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6 *Motors Financial Company, Inc.*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 SHELLEY T. PADDOCK,

12 Plaintiff,

13 vs.

14 EXPERIAN INFORMATION
15 SOLUTIONS, INC., and
16 AMERICREDIT CORP./GENERAL
17 MOTORS FINANCIAL COMPANY,
INC., DOES I-V, individually; and ROE
CORPORATIONS VI-X, inclusive,

18 Defendant.

Case No.: 2:20-cv-02097-JCM-DJA

Compl. Filed: November 13, 2020

**STIPULATION TO EXTEND
DEFENDANT AMERICREDIT
CORP./GENERAL MOTORS
FINANCIAL COMPANY, INC.'S
TIME TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

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20 This Stipulation to Extend defendant AmeriCredit Corp./General Motors
21 Financial Company, Inc.'s Time to Respond to Complaint is made by and between
22 Plaintiff Shelley T. Paddock ("Plaintiff") and Defendant AmeriCredit Corp./General
23 Motors Financial Company, Inc. ("AmeriCredit/GM") through their respective counsel,
24 in light of the following facts:

25 RECITALS

26 A. Plaintiff filed the Complaint ("Complaint") against Defendants on or
27 about November 13, 2020.
28

1 B. AmeriCredit/GM was served with the Complaint on or about November
2 18, 2020.

3 C. AmeriCredit/GM's current deadline to respond to the Complaint was
4 December 9, 2020,

5 D. The parties agreed on December 7, 2020 that AmeriCredit/GM would
6 have through January 7, 2021, to respond to the Complaint in order to give
7 AmeriCredit/GM time to investigate Plaintiff's claims and prepare a proper response, and
8 for the parties to discuss a potential resolution of this matter. Due to a
9 miscommunication/misunderstanding, this actual stipulation did not get filed with the
10 court until today.

11 E. There is good cause to grant this stipulation because AmeriCredit/GM
12 requires additional time to investigate Plaintiff's claims and prepare a proper response,
13 and the parties require additional time to consider a resolution of this matter.

14 F. This stipulation is filed in good faith and not intended to cause delay.

15 G. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and
16 AmeriCredit/GM respectfully request that the Court extend AmeriCredit/GM's time to
17 respond to Plaintiff's Complaint through January 7, 2021.

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STIPULATION

NOW, THEREFORE, Plaintiff and AmeriCredit/GM hereby stipulate and agree that AmeriCredit/GM has up to and including January 7, 2021, to file a response to Plaintiff's Complaint.

IT IS SO STIPULATED.

DATED this 14th day of December, 2020 DATED this 14th day of December, 2020

KIND LAW

LEWIS ROCA ROTHGERBER CHRISTIE

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Corp./General Motors Financial
Company, Inc.

ORDER

IT IS SO ORDERED.



United States Magistrate Judge

Dated: December 15, 2020

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Las Vegas, NV 89169-5996

Lewis Roca
ROTHGERBER CHRISTIE